

### **REMARKS/ARGUMENTS**

Claims 1-4, 12-14, 16-17, 20-21 and 23-30 have been amended by this Amendment. Claim 10 has been previously cancelled. Claims 1-9 and 11-30 are currently pending in the application and are at issue herein.

#### **§ 112 Claim Rejections**

Pending claims 1-9 and 11-30 stand rejected under § 112, first and second paragraphs, as failing to comply with the written description requirement and as being indefinite. Applicants submit that the amendments made to the claims herein address the § 112 rejections.

With respect to the § 112, first paragraph, rejections, Applicants submit that support can be found in the Application as originally filed at least at paragraph [4]8 and original claim 1. These disclosures provide support for the subordinate aspect of the various purchasing card accounts and the different levels of subordination which results in a tree-like hierarchy structure, as well as for the linking of individual cards to one purchasing card account. Thus, Applicants submit that the claims, as amended, overcome the § 112, first paragraph, rejections, and respectfully request withdrawal thereof.

With respect to the § 112, second paragraph, rejections, Applicants have removed the terms "linkable" and "transferable" from the claims. Additionally, Applicants have corrected any antecedent basis issues. Thus, Applicants submit that the § 112, second paragraph, rejections have been overcome, and respectfully request withdrawal thereof.

**§ 103 Claim Rejections**

Pending claims 1-9 and 11-30 stand rejected under § 103(a) as obvious over various combinations of U.S. Publication No. 2003/0120571 to Blagg ("Blagg"), U.S. Publication No. 2002/0099659 to Swentor ("Swentor") and U.S. Patent No. 6,581,035 to Madan et al. ("Madan"). Applicants respectfully traverse the claim rejections for at least the following reasons.

As discussed with the Examiner during the interview held on December 14, 2009, none of the cited references disclose or suggest a private network for managing petty cash disbursements through the linking of various pre-paid purchasing card accounts to a master account linked to a bank account. As recited in the pending claims, the master account is linked to a bank account having a predetermined amount of funds deposited therein by a funding entity. The various pre-paid purchasing accounts are linked, directly or indirectly, to the master account, and each includes a predetermined amount of pre-paid funds deposited therein. The pre-paid funds are used to make purchases via a card held by a user which is associated with a respective pre-paid purchasing card account. Also recited in the pending claims is the re-usable aspect of the cards, in that they may be re-used by the card holder within various private networks set up within the overall inventive system. Such re-usability of pre-paid funded cards is neither taught nor suggested by the cited art.

None of the cited references disclose the use of pre-paid funds to make purchases. Blagg discloses a method for linking accounts corresponding to different products together to create a group so that group processing can be performed at the group level, while independent processing of the accounts is performed at the account level. Blagg links the accounts into a

group by linking a financial record for each account to group master data for the group. The group typically includes a key account and one or more dependent accounts. A dependent strategy for a dependent account specifies the authorization option for the dependent account. The authorization option in Blagg specifies the information that is used to authorize a transaction. Payment for a dependent account is credited depending upon who pays an invoice. If a dependent account card holder in Blagg, such as a son or daughter, pays the invoice, the dependent card holder is credited. However, if the dependent account is paid by the primary owner, then the amount of the payment that is credited to the dependent account depends upon the control settings for the group and the amount of the payment.

In short, Blagg is a credit vehicle which combines credit for a group in order to make transactions. This is distinctly different from depositing pre-paid funds into an account and allowing those funds to be drawn against to make purchases. A holder of a subordinate pre-paid purchasing card account in the present invention cannot rely upon any credit limit of a primary owner, as the present invention is not concerned with credit, but rather pre-paid funds. For example, the master account may allocate \$10,000 to a subordinate pre-paid purchasing card account. That subordinate pre-paid purchasing card account may spend that money or allocate all or some of it to accounts subordinate thereto. Once the \$10,000 is spent, however, the subordinate pre-paid purchasing card account will need to go back to the master account and request additional funds. Unlike Blagg, there is no group line of credit, no group processing of payments, and no group redeeming of reward points in the present invention.

Swentor had been cited for teaching an integrated full service system between master account holders and subordinate account holders. Madan has been cited as disclosing the use of

voice recognition software to accomplish transactions. Neither Swentor nor Madan disclose or suggest any type of private network for managing financial transactions through the use of pre-paid funds and linking and unlinking pre-paid purchasing card accounts to various subordinate pre-paid purchasing card accounts which may be owned by completely different entities. There is no disclosure or suggestion in either Swentor or Madan of the use of any type of pre-paid funding vehicle where pre-paid funds can be allocated to lower level accounts from higher level accounts in the hierarchical chain. Thus, any combination of Blagg with either Swentor or Madan would not arrive at the claimed invention.

Accordingly, Applicants submit that pending claims 1-9 and 11-30 are allowable over Blagg, Swentor and Madan, taken alone or in any combination.

### **Conclusion**

For at least the above reasons, the Applicants respectfully submit that all pending claims are in a condition for allowance. Applicants request reconsideration of all currently pending claims, the withdrawal of the rejections under §§ 112 and 103, and the issuance of a Notice of Allowance of all currently pending claims at the earliest possible time.

It is believed that this Amendment requires a two-month extension of time. Accordingly, a petition for a two-month extension of time, which also authorizes payment of the fee to Deposit Account No 02-4800, is submitted herewith.

The Commissioner is hereby authorized to charge any underpayment or credit any overpayment associated with this communication to Deposit Account No. 02-4800. Should any

issues remain, the Examiner is invited to contact the undersigned at the number listed below to advance prosecution of the case.

Respectfully submitted,

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